

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

V.

SANFORD MEEKINS

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14-CR-10022-WGY

**MOTION TO CONTINUE FINAL
REVOCATION OF SUPERVISED RELEASE HEARING**

Now comes **SANFORD MEEKINS** and requests this Honorable Court continue the revocation of supervised release hearing now set for July 30, 2015 to August 12, 13, or 14, 2015, or such further date as is convenient to the calendar of this Court.

As grounds for this request, the undersigned assigns the following:

1. In connection with preparing this case for presentation to the Court on the scheduled hearing date, the undersigned and his client have had ongoing dealing and dialogue with the attorney for the government which resulted in a proposed draft plea agreement and an “agreement to disagree” on an appropriate disposition of the case within the sentencing range and the alternatives to incarceration available for the range established by the U.S.S.G.
2. On July 23, 2015, counsel for the government notified the undersigned that the proposed plea agreement between the parties would not be approved by the Office of the United States Attorney and a new and more severe disposition of the case was then advanced for consideration, if the defendant was interested in achieving an agreed resolution of the matter with the government for presentation to this Court.

3. The undersigned presented this change in the complexion of the case to the defendant and was scheduled to meet with Mr. Meekins on Monday, July 27, 2015 to discuss the rather abrupt “about face” in the direction of the prosecution, and Mr. Meekins’ thoughts on resolution of the controversy.
4. On Monday, July 27, 2015, the undersigned telephoned to finalize and confirm defendant’s appointment at counsel’s law offices and was told that the defendant was “out” but expected to return shortly and would call at that time.
5. At or around 5:00 p.m. on Monday, July 27, 2015, the undersigned was informed that the defendant was at a hospital in New Hampshire and later that evening, at or about 9:30 p.m., he was advised that the defendant had been admitted to Exeter Hospital, Exeter, New Hampshire.
6. As of 4:00 p.m. on July 28, 2015, the undersigned was advised that Mr. Meekins remains hospitalized in Exeter, New Hampshire and that while some physical tests have shown nothing negative, and that a scan of his brain does not disclose evidence of a stroke, further testing, in the form of an EEG was performed on Tuesday, July 28, 2015 and the results are pending.
7. Undersigned has also been advised that Mr. Meekins will likely remain an inpatient at Exeter Hospital at least through Friday and that, if all physical tests are negative, Mr. Meekins will likely then be transferred to an inpatient psychiatric facility in Massachusetts.
8. Beyond that, further information is not available at this time.

WHEREFORE, the undersigned requests that the sentencing hearing now scheduled for July 30, 2015 be continued to a date convenient to the Court. Undersigned counsel suggests August 12, 13 or 14 due to the fact that he hopes to be out-of-state on preplanned vacation trips during the period August 3, 4, 5, and August 7 – 10, 2015.

Respectfully Submitted,
SANFORD MEEKINS,
By his attorney,

/s/ George F. Gormley
George F. Gormley, BBO #204140
George F. Gormley, P.C.
755 East Broadway
South Boston, MA 02127
Tel: 617-268-2999
Fax: 617-268-2911
gfgormley@aol.com

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent to the registered participants as identified on the Notice of Electronic Filing (NEF) on July 28, 2015.

/s/George F. Gormley
George F. Gormley